



April 21, 2008

VIA EMAIL AND U.S. MAIL

The Honorable Justices of the
Washington State Supreme Court
P. O. Box 40929
Olympia, WA 98504-0929

Re: **Comments – APR 11 Regulations of the Washington State Board of
Continuing Legal Education**

Dear Honorable Justices:

I am writing to support the removal of a cap on the number of MCLE credits which may be earned from in-house courses. Simply put, I specialize in the representation of private and public employers in employment and labor law, and our firm, Littler Mendelson, previously known as Littler, Mendelson, Fastiff, Tichy & Mathiason, is the largest employment and labor law firm in the United States and is the foremost provider of continuing education courses and materials affecting my area of practice. Given the nature of my specialty, it is critical that the continuing education be relevant and useful. Any limitation on the number of MCLE credits related to courses provided by our firm would be counterproductive, cumbersome and of little value.

In considering my comments, please realize that I am an active member of the Washington State Bar Association and will complete my 40th year as a Washington lawyer in December. I am also a member of the California State Bar Association and have been admitted to practice before the U. S. District Courts in Washington, California and the Eastern District of Michigan. I am also admitted to practice before the U. S. Court of Appeals for the Ninth Circuit, the U. S. Court of Appeals for the D.C. Circuit, as well as the U. S. Supreme Court. My practice has included a number of cases which have gone to the U. S. Supreme Court, two of which involved oral argument before the Court.

My comments are based on experience not only with regard to the Washington State Bar Association but to the California State Bar Association, which also has MCLE requirements. Our firm's annual presentation is known as the National Employer Conference which is usually held each year in Scottsdale, Arizona. Lawyers and human resources professionals throughout the United States as well

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RONALD R. CARPENTER

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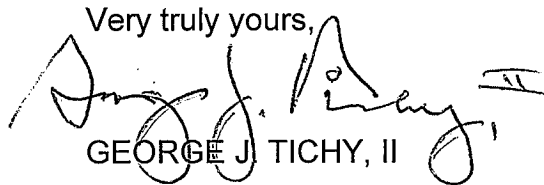
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as lawyers from throughout the world attend to learn the latest developments in employment and labor law and to be able to learn information which can be applied to his/her practice. This year, approximately 30 attorneys from outside the United States were in attendance. The training which we provide often included presenters other than lawyers in our firm. For example, federal and state judges as well as the Chairman of the National Labor Relations Board have been speakers at a number of the conferences. Our publications which are provided to those attending are in virtually every law library in the United States of firms whose practice involves employment and labor law. As you can see, a "wooden" rule which limits in-house credits simply provides no value to those in our area of practice.

Should any of the justices desire to discuss this issue with me, please do not hesitate to give me a call.

Very truly yours,

GEORGE J. TICHY, II

GJT/lc